REMARKS

Claims 1-42 are currently rejected. Applicant has amended Claims 1-3, 5-6, 11-13, 15-16, 21, 23, 24, 31-32, 33, 35 and 37. Support for the amendments to Claims 1, 11, 31, and 37 can be found, for example, in Claim 26, and throughout. Support for the amendments to Claim 33 can be found, for example, in Claims 32, 42, and throughout. Support for the amendments to Claims 5, 15, 21, 23 can be found, for example, in para. [0109] of the substitute specification and/or the claims themselves, and throughout. Claims 2-3, 6, 12-13, 16, 24, 32, 35 have also been amended to correct a minor scriber's error or to align claim language. Support for the amendments to these claims can be found in the claims themselves. The Applicant submits that these minor amendments and corrections herein are made without prejudice as to patentability, including the doctrine of equivalents, and no new matter has been added. Applicant submits herewith a petition for a three-month extension of time and the required fee of $510 for a small entity. The Commissioner is authorized to charge any additional fees to the deposit account of Bracewell & Giuliani, LLP, deposit account no. 50-0259, attorney docket no. 027299.000002.

Claims 1-42 are Novel and Nonobvious

The Examiner has rejected Claims 31 and 37-41 under U.S.C. § 102(e) as being anticipated by Belski et al., U.S. Patent No. 6,657,552 ("Belski"); Claims 1-20, 26-30, 32-36, and 42 under 35 U.S.C. § 103(a) as being unpatentable over Belski in view of Durrant et al., U.S. Patent No. 7,061,924 ("Durrant"); Claims 21-23 under 35 U.S.C. § 103(a) as being unpatentable over Belski in view of Cumeralto et al., U.S. Publication No. 20020109607 ("Cumeralto"), and Claims 24-25 under 35 U.S.C. § 103(a) as being unpatentable over Belski in view of Cumeralto and further in view of Durrant. Applicant respectfully traverses the rejection.

Claimed Embodiments of the Present Invention

As perhaps best shown in FIG. 2, the various claimed embodiments of the present invention feature a distributed network system (30) providing service to multiple customers and includes, at each customer location (40), one or more utility meters (72), (74), etc., a sensor interfaced with each meter, and a meter data collector or residential control unit (41) in

communication with the sensor, and functioning as a communication node of the network system (30). The system (30) also includes a remote automatic meter reading control center including a host computer (61), e.g., a server, for gathering and processing the usage reading data. The system (30) also includes system software associated with the host computer (61) which can include network software having a network protocol, e.g., a preselected application layer protocol, to communicate over a network connected to each of the meter data collectors (41). The network software is capable of querying or polling each meter data collector (41) to determine a preferred communication route between the host computer (61) and each of the meter data collectors (41) typically from among multiple potential communication routes. The determination can be, at least in part, based on signal strength between meter data collectors (41), and other quality factors. In response to polling, in one configuration, the meter data collectors (41) transmit collected meter data in separate data packets along their respective preferred communication routes. In this configuration, the data packet containing the instructions can be sent back to the primary host (61) with the meter data in the payload replacing the instructions. In another configuration, the payload of the packet providing the instructions can be used to contain or "rake" in the meter data from multiple meters along a predetermined preferred communication pathway. Field hosts (51) functioning either as routers or as data collectors can extend the reach of the host computer (61) through the use of one or more conventional networks (80). In one or both of the above configurations, the system (30) can utilize inter-node frequency hopping after each transmission to help ensure data packet transmission reliability.

The Cited Documents

As perhaps best shown in Belski FIG. 3 and described in col. 6, lines 20-60, Belski discloses a system which includes an interface device (E^{CDB} or CDB) which can collect meter data from multiple utility meters (E), (G), (W); and a network server (NCS) which allows modules (S) to communicate with the interface device (E^{CDB} or CDB). Modules (S) are connected via optical ports to the network server (NCS) and provide manual read and diagnostic capabilities. The utility meters (E), (G), (W) communicate with the interface device (E^{CDB} or CDB) via low-power spread spectrum technology. *See* col. 5, lines 18-21. The interface device

(E^{CDB} or CDB) serves as a *gateway* for collecting and communicating meter data to a master station over a wide-area network WAN (via telephone, cellular or broadband modems, or any other wireless network with public switched networks). *See* col. 6, lines 20-23, and 53-55. Notably, both the E^{CDB} and CDB ("*gateways*") are positioned in direct communication with the WAN and are not disclosed, taught, or suggested as being capable of wireless communication with other E^{CDB} and CDBs. Nor do utility meters (E), (G), (W) communicate with each other.

As perhaps the shown in Durrant FIG. 2, Durrant discloses a monitoring system (200) including a network of monitoring devices (100) which can be established on an ad hoc basis. The network (200) can include intermediate devices (204) to relay data, and a central gateway (208) interfaced with a WAN to relay the monitoring data to a network-based application (not shown) that resides on or is interfaced to the WAN. The transmitters for the monitoring devices (100) are capable of up to 100 milliwatts of transmit power and ranges of 100 meters. The IP (connectionless) protocol is the primary methodology of retrieving data according to the exemplary embodiment. A mobile ad hoc networking (MANET) protocol can be used to form a random, multi-hop graph or "ad hoc" network. As described in col. 5, line 66 to col. 6, line 9, Durrant discloses that gateway (208) maintains a routing table to each device (100) in its network in the form of a list or chain of IP addresses. Each non-gateway device (100), however, is only described as containing a routing table that contains the next-hop IP address that will lead back to the gateway (208). *See* col. 6, line 3-5. In other words, each device (100) maintains a list of other devices (100), (208) that are within transmission range (one-hop) of the respective device (100), rather than a complete route from the device (100) to the gateway (208). When the device (100) wishes to send data to the gateway (208), the device (100) requests each adjacent device (100) to try to send the data to the gateway (208), and those devices (100) request each adjacent device (100) to do so, and so on, until the data reaches the gateway (208). *See* col. 9, lines 10-28. As such, if a device (100) that is 2 hops away transmits its data and that data is received by more than one other device (100), the gateway (208) would receive duplicate data--the result being unnecessary network congestion.

Cumeralto discloses a system including a plurality of "PET" radio frequency (RF) transmit-only devices (22) that gather and encode utility consumption and tamper information,

and transmit this data via RF repeater units (24) or base units (26) using a high power frequency hopping *spread spectrum* (FHSS) technology. Notably, Cumeralto is specifically directed only to such frequency hopping spread spectrum technology. *See* para. [0012].

As will be described in more detail below, neither Belski, Durrant, nor Cumeralto disclose, teach, or suggest establishing a preferred polling sequence based at least in part on inter-node signal strength; returning meter data along a preferred multi-hop communication pathway; an autosequencer to initiate polling to determine a signal strength between host computer and each meter data collector (communication node) or between individual meter data collectors; a raking router or rakingly collecting meter data; a meter data collector database including collector physical address and strength of signal between collectors; combining data from multiple meters into a single data packet; polling a node positioned within a glass housing; and a utility or end-user computer described as having an RF transceiver, each featured in one or more of the claims. There are also other features not mentioned in the cited documents that are featured in the claims, identified below.

No Prima Facie Case of Obviousness

Claims 1-20, 26-30, 32-36, and 42 along with Claims 31 and 37-41 (amended to have similar features to that of Claim 26) are novel and nonobvious.

Applicant respectfully submits that the Examiner has not established a *prima facie* case of obviousness. To establish a *prima facie* case of obviousness, at least three basic criteria must be met. There must be some suggestion or motivation, either in the prior art references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or combine the reference or teachings. *See* MPEP 2143. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on Applicant's disclosure. *See* MPEP 706.02(J) *citing In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Also, there must be a reasonable expectation of success in modifying or combining references. However, "[t]he mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification." *See In re Fritch*, 23 U.S.P.Q. 2d 1780,

1784 (Fed. Cir. 1992). Finally, the prior art references, as combined, must teach or suggest all the claim elements. The Applicant respectfully submits that neither of the cited documents suggest any explicit or implicit motivation or desire to combine the documents to accomplish the claimed embodiments of Applicant's present invention.

No Motivation to Combine Reference Teachings

Applicant respectfully submits that the Examiner has not met the first element of a *prima facie* case for obviousness. First, there is no explicit suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference(s) or to combine reference teachings. The Examiner has the burden of showing, as such, and has not met it here. Nor is there anything implicit suggesting combining the references, as the combined teachings, knowledge of one of ordinary skill in the art, and nature of the problem to be solved, as a whole, would not suggest doing so to those of ordinary skill in the art, as is required in MPEP 2143.01 and *In re Kotzab,* 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000).

For example, Belski recognized that manual water and gas meters had a limited future. *See* col. 2, lines 5-13. Belski sought to solve its problem by integrating the utility meters with an RF transmitter which could pass data to an interface unit or central data box (CDB). *See* col. 4, lines 52-64. Communication between the utility meters (E), (W), (G) and the CDB are via a LAN system employing *low*-power RF spread spectrum technology. *See* col. 5, lines 19-22. The CDBs, intern, serve as a gateway for collecting and communicating meter data to a master station via the WAN. *See* col. 5, lines 22-24.

Possibly the most important problem to which Applicant wishes to solve, as identified in Claim 1, is the need to "reduce line-of-site communication problems between each of the plurality of meter data collectors and...host computer." As correctly articulated by the Examiner, Belski does not solve such problem.

Durrant, on the other hand, recognized problems with access to utility meters, problems with the costs associated with prior automated meter reading systems, and problems with interleaved service suppliers causing a non-contiguous patchwork of customers (*see* col. 2, lines

6-21). Cumeralto, specifically directed to only frequency hopping spread spectrum technology, recognized problems associated with radio interference (*see* paras. [0008] and [0012]). As a minimum, neither of these documents recognize Applicant's articulated problem. Thus, the combined teachings, knowledge of one of ordinary skill in the art, and nature of the problem to be solved, as a whole, do not suggest combining these references, as the combination would not solve the Applicants' problem.

Second, the Examiner's statements, alone, for example, that it would have been obvious to "modify the automated meter reading network system of Belski et al., by incorporating the plurality of meter data collectors...because Durrant et al. discloses a meter reading network system and method that employs software control communication protocols..." is insufficient to establish a *prima facie* case of obviousness, even assuming the combination would actually solve the problems (which Applicant contends it would not for reasons described below). Even assuming a motivation and an ability to combine the references, MPEP 2143.01III states the "fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the *desirability* of the combination." (Emphasis added). Neither of these documents suggest such desirability. Belski was clearly interested in low-power transmissions between its utility meters and its gateway CDB. Assuming the Belski CDB, explicitly described as performing a gateway function, could somehow be equated with the Durrant gateway (208), the combination of reference teachings would result in requirements for less CDBs, but a much less secure system and much more distributed utility meters requiring additional hardware and much higher power transmission capabilities to form an ad hoc network to relay meter data of adjacent utility meters to a nearby CDB for transmission across the WAN to the master station. If the Belski CDBs are equated with the Durrant devices (100), the Belski network would have to be completely restructured.

Still further, Applicant respectfully submits that the Examiner has overlooked an important point that the motivation to combine references must be to produce a "proposed modification of the applied reference(s) necessary to arrive at the claimed subject matter." *See* MPEP 706.02(j). As noted above, and as will be described in more detail below, neither Belski, Durrant, nor Cumeralto, individually or collectively, disclose, teach, or suggest, for example,

establishing a preferred polling sequence based at least in part on inter-node signal strength or returning meter data along a preferred multi-hop communication pathway, along with many other novel and nonobvious features each provided in one or more of the claims.

Correspondingly, neither of these documents, even when combined with the knowledge of one skilled in the art, provide the necessary motivation to combine reference teachings or modify Belski to somehow arrive at the claimed invention, and each of these documents alone, and in combination, fails to teach or suggest the claimed embodiments of the invention. It is only through using Applicant's disclosure, used as a roadmap, that one would try to combine these documents to try to "build" the claimed embodiments of the Applicant's invention. Therefore, Applicant respectfully submits that the first element of a *prima facie* case of obviousness has not been satisfied, and for this reason, the claimed embodiments of the invention are novel, non-obvious, and define over the cited documents.

No Reasonable Expectation of Success

As will be described in more detail below, even if there were a motivation to combine the teachings of the cited documents (which Applicant contends there is not), and even if the cited documents could be combined, neither document nor the hypothetical combination, discloses, teaches, or suggests the various features such as: establishing a preferred polling sequence based at least in part on inter-node signal strength; returning meter data along a preferred multi-hop communication pathway; an autosequencer to initiate polling to determine a signal strength between host computer and each meter data collector or between individual meter data collectors; a raking router or rakingly collecting meter data; etc., each featured in one or more of the claims. As such, there is no reasonable expectation of success that the proposed combination would produce the claimed subject matter. Correspondingly, the second element of a *prima facie* case of obviousness has not been satisfied, and for this reason as well, the claimed embodiments of the invention are novel, non-obvious, and define over the cited documents.

The Cited Documents Do Not Teach or Suggest All the Claim Elements

Applicant submits that neither Belski, Durrant, nor Cumeralto, alone or in combination, disclose, teach or suggest all of the elements of the claimed embodiments of the present invention. For example, independent Claim 1 features "a host computer...positioned to determine a preferred polling sequence route..., and positioned to determine a respective preferred communication sequence path *to the host* computer for each respective polled meter data collector to thereby reduce line-of-site communication problems between each of the plurality of meter data collectors and the host computer." Independent Claim 11 features "a host computer...positioned to poll each of the plurality of meter data collectors, and positioned to determine a respective preferred communication sequence path *to the host* computer for each respective polled meter data collector." Independent Claim 26 features "determining a preferred polling sequence route..., polling each of the plurality of meter data collectors with the preferred polling sequence by the host computer positioned remote from the plurality of meter data collectors, and transmitting meter usage data *to the host* computer from each of the plurality of meter data collectors along the preferred polling sequence route responsive to the polling by the host computer." Independent Claim 37 features "polling each of the plurality of remote collection units along a preferred polling sequence route from a collection computer positioned remote from the plurality of remote collection units, and transmitting meter data from each of the plurality of remote collection units *to the collection computer along the preferred polling sequence route* responsive to the polling."

The Examiner on page 8, lines 1-2 of this office action (citing Belski col. 6, lines 61-67; and col. 7, lines 1-59) indicated Belski teaches determining a polling sequence of a communication signal between remote host computer and a plurality of meter data collectors. Applicant respectfully submits that the Examiner is mistaken. Referring to Belski FIG. 3 and col. 6, lines 20-23, the E^{CDB} and CDB ("*gateways*") are positioned in direct communication with the WAN and are not disclosed, taught, or suggested as being capable of wireless communication with other E^{CDB} and CDBs. *See* FIG. 3 and col. 6, lines 20-23. Nor do utility meters (E), (G), (W) communicate with each other. Further, each utility meter (E), (G), (W) is only disclosed is being one hop away from the E^{CDB} and CDB gateways. Thus, as Belski does not teach anything

other than one-on-one direct communication, Belski could not teach polling multiple meter data collectors along a polling sequence route.

Nevertheless, in paraphrase, the Examiner then states on pages 8-9 that there would be motivation to combine reference teachings because Durrant employs a software control communication protocol that polls its devices (100) based on a table that specifies a polling route. Even assuming there could somehow be motivation to employ all the extensive hardware and software modifications necessary to turn Belski into a multi-hop network, and that Durrant performs polling operations, Durrant simply does not provide a teaching of determining (through such polling) a preferred communication pathway *from* devices (100) *to* central gateway (208) or the ultimate destination, or providing such route to the devices (100) for returning data. Instead, and is perhaps best shown in Durrant FIG. 6 and described in col. 9, lines 10-28, the devices (100) perform a series of one hop transfers to each device (100) within transmission range of the transmitting device (100) that is a next hop to the gateway (208), until such data arrives at the gateway (208).

These features, provided in independent Claims 1, 11, 26, and 37, are important as they not only help solve Applicant's primary problem, they also overcome Durrant's congestion problems resulting from multiple data packets containing the same information arriving at the same gateway. Further, such features enhance determining if a meter data collector has dropped off-line, without necessarily having to request data from the affected meter. This would not be the case if one were to employ either the Durrant system or the Belski system as modified by Durrant, if such modification were possible. As such, independent Claims 1, 11, 26, and 37, have been shown to be novel and nonobvious and define over the cited documents.

Still further, Claims 1 and 26 also features determining the preferred polling sequence route responsive at least in part to a strength of communication signal between the host computer and each of the plurality of meter data collectors (*inter-device communication signal strength*). Notably, Durrant says nothing with respect to selecting a route between its meter reading application or gateway (208) and either of its devices (100) from among multiple suitable routes based on signal strength. Nor does the Examiner state such or provide such reference passage, except in his conclusion. For the reasons stated above, Durrant does not have, and therefore

cannot teach, such important feature which helps ensure that the "preferred" communication path is optimally robust, and not merely the first one generated. As such, Claims 1 and 26 have further been shown to be novel and nonobvious and define over the cited documents.

Independent Claim 31, on the other hand, features "transmitting the meter data to a router of a communication network service provider along a predetermined multi-hop communication sequence path responsive to a request by a computer device provided in a data packet payload, and transmitting the meter data through a communication network associated with the communication network service provider in the data packet payload [*of the received data packet*]." Independent Claim 33 features "consolidating the utility meter data of the first remote collection unit with the utility meter data of the second remote collection unit into a *same data payload*, and transmitting the utility meter data of the first remote collection unit and the utility meter data of the second remote collection unit from the second remote collection unit to a host computer." Applicant has reviewed the passages cited by the Examiner but has been unable to find any disclosure or teaching of such features. Thus, and in accordance with the above description of the Belski, Durrant, and Cumeralto documents, neither of these documents appear to even remotely identify, and therefore cannot teach, such data packet recycling or data packet consolidating features. As such, Claims 31 and 33 have been shown to be novel and nonobvious and define over the cited documents.

Independent Claim 35 features "collecting utility meter data by the remote collection unit positioned within the housing, polling the remote collection unit from a host computer by radiofrequency data communication *through the glass facing*, and transmitting the collected utility meter data from the remote collection unit *through the glass facing* to the host computer responsive to the polling." These are important structural and bidirectional communication features not disclosed in either of the cited documents. Particularly, the Examiner identifies the combination of Belski, col. 5, line 65 to col. 6, line 30 to support polling, with Cumeralto, page 3, para. [0040] to support having a meter structure having a glass facing on at least one side. The claim, however, features performing the polling and sending the data through the glass housing. Neither Belski nor Cumeralto indicate whether its antenna is positioned to transmit through the glass. This is an important structural consideration not disclosed, taught, or suggested. Further,

even if the Cumeralto PET device has an antenna which transmits through the glass portion of the housing, the Cumeralto PET module is a transmit-only device (para. [0040]), and therefore would not teach "polling...through the glass facing," as featured in the claim. As such, Claim 35 has been shown to be novel and nonobvious and define over the cited documents.

Therefore, Applicant respectfully submits that the third element of a *prima facie* case of obviousness has not been satisfied with respect to independent Claims 1, 11, 26, 31, 33, 35, and 37. Accordingly, in view of the lack of motivation to combine the cited documents, lack of a reasonable expectation of success in developing claimed embodiments of the Applicant's invention even using Applicants specification as a roadmap to do so, and a lack of teaching or suggestion of each and every element of each independent claim, Applicant respectfully submits that Claims 1, 11, 26, 31, 33, 35, and 37 are novel, nonobvious and patentable over the cited documents.

The dependent Claims 2-10, 12-20, 27-30, 32, 34, and 38-42, have therefore also been shown to be allowable because their corresponding independent claims have been shown to be novel and non-obvious. Nevertheless, the dependent claims include independent novelty.

For example, Claims 3 and 13 were rejected over Belski. Belski, however, does not disclose, teach, or suggest a utility or end-user computer described as having an RF transceiver as featured in the claims. The Applicant has reviewed the passages cited by the Examiner (col. 5, lines 19-31; col. 7, lines 1-39), but was unable to identify such disclosure, teaching, or suggestion.

Claims 5 and 15 (and 23) were also rejected over Belski. Belski, however, does not disclose, teach, or suggest the frequency continuously changes between a different one of a plurality of preselected frequencies between complete data packet transmissions. Belski discloses the use of spread spectrum frequency-hopping. *See* col. 24, lines 5-9. Such spread spectrum transmissions distribute individual data packets across multiple frequencies. Such disclosure does not teach rolling through different frequencies after each data packet transmission.

Claims 6-7, and 16-17 (and 24-25) were rejected over Belski, Durrant, and the Examiner's official notice. Neither of the cited documents, nor the hypothetical combination, however,

disclose, teach, or suggest an autosequencer to initiate polling to determine a signal strength between host computer and each meter data collector or between individual meter data collectors as featured in the claims. If the Examiner maintains the rejection, Applicant respectfully requests a reference citation

Claims 8, 18, 28 were rejected over Durrant. Durrant, however, does not disclose, teach, or suggest a raking router or rakingly collecting meter data as featured in the claims. The Applicant has reviewed the passages cited by the Examiner (col. 5, lines 1-67; col. 6, lines 1-67), but was unable to identify such disclosure, teaching, or suggestion. Durrant employs specific IP addressing and a receive and forward concept. Durrant does not disclose, teach, or suggest any form of raking of data or data packets.

Claims 10, 20, and 30 were rejected over Belski. Belski, however, does not disclose, teach, or suggest a meter data collector database including collector physical address and *strength of signal between collectors* as featured in the claims. The Applicant has reviewed the passages cited by the Examiner (col. 7, lines 1-16), but was unable to identify such disclosure, teaching, or suggestion.

Claims 32, 33 and 42 were also rejected over Belski. Belski, however, does not disclose, teach, or suggest combining data from multiple meters into a single data packet as featured in the claims. The Applicant has reviewed the passages cited by the Examiner, but was unable to identify such disclosure, teaching, or suggestion. This is an important feature which can reduce congestion, not disclosed, taught, or suggested by either of the cited documents.

Claim 38 was rejected over Belski. Belski, however, does not disclose, teach, or suggest a field unit capable of polling multiple remote collection units as featured in the claim. The Examiner equated the claimed field host unit with network server NCS (FIG. 3). Each network server (NCS), however, is only shown to interface with a single E^{CDB} or CDB; and as identified previously, the modules (D) are not remote collection units.

Correspondingly, Claims 1-20, 26-30, 32-36, and 42 along with Claims 31 and 37-41 have been shown to be novel and nonobvious and define over the cited documents.

Claims 21-23 Are Also Novel and Non-Obviousness

The Examiner rejected Claims 21-23 over Belski in view of Cumeralto. Independent Claim 21 features, at least in part, (1) a collector controller and memory *positioned within a utility meter housing*, (2) to control data communication to and from a *high power* transceiver and (3) to provide *bidirectional radio frequency communication*. As described previously, Belski discloses use of low-power or direct connection interfaces and Cumeralto teaches that it's PET modules are transmit only devices (para. [0040]). As such, even if there were a motivation to combine document teachings (which there is not), such combination would not provide a device having each and every claim element.

Accordingly, in view of the lack of motivation to combine the cited documents (described previously), lack of a reasonable expectation of success in developing claimed embodiments of the Applicant's invention even using Applicants specification as a roadmap to do so (also described previously), and lack of teaching or suggestion of each and every element of each independent claim, Applicant respectfully submits that independent Claim 21 is novel, nonobvious and patentable over the cited documents. The dependent Claims 22-25 have therefore also been shown to be allowable because their corresponding independent claim has been shown to be novel and non-obvious. Nevertheless, the dependent claims include independent novelty.

For example, as noted previously Claim 23 was rejected over Belski. Belski, however, does not disclose, teach, or suggest the frequency continuously changes between a different one of a plurality of preselected frequencies between complete data packet transmissions. Belski discloses the use of spread spectrum frequency-hopping. *See* col. 24, lines 5-9. Such spread spectrum transmissions distribute individual data packets across multiple frequencies. Such disclosure does not teach rolling through different frequencies after each data packet transmission.

Claims 24-25 were rejected over Belski in view of Cumeralto and in further view of Durrant, and also apparently in view of the Examiner's official notice. Neither of the cited documents, nor the hypothetical combination, however, disclose, teach, or suggest an *autosequencer* to initiate polling *to determine a signal strength* between host computer and each

meter data collectors or between individual meter data collectors as featured in the claims. If the Examiner maintains the rejection, Applicant respectfully requests a specific reference citation to a teaching of an autosequencer to initiate polling to determine a signal strength between meter data collectors.

Correspondingly, in accordance with the discussion above, Claims 21-25 have been shown to be novel and nonobvious and define over the cited documents.

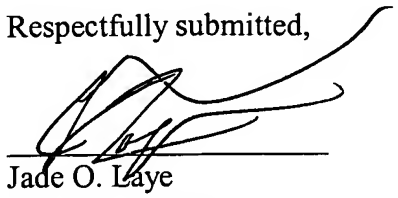
In commenting upon the references and in order to facilitate a better understanding of the differences that are expressed in the claims, certain details of distinction between the cited documents and the claimed embodiments of the present invention have been mentioned, even though such differences do not appear in all of the claims. It is not intended by mentioning any such unclaimed distinctions to create any implied limitations in the claims. Not all of the distinctions between the prior art and the claimed embodiments of Applicant's present invention have been made by Applicant. For the foregoing reasons, Applicant reserves the right to submit additional evidence showing the distinctions between claimed embodiments of Applicant's invention to be nonobvious in view of the cited documents.

The foregoing remarks are intended to assist the Examiner in re-examining the application and in the course of explanation may employ shortened or more specific or variant descriptions of some of the claim language. Such descriptions are not intended to limit the scope of the claims; the actual claim language should be considered in each case. Furthermore, the remarks are not to be considered to be exhaustive of the facets of the invention that render it patentable, being only examples of certain advantageous features and differences that Applicant's attorney chooses to mention at this time.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that the Application is in condition for allowance. Accordingly, the issuance of a Notice of Allowance in due course is respectfully requested.

Respectfully submitted,



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